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Chrome Hearts LLC*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHROME HEARTS LLC, a Delaware Limited Liability Company, Plaintiff, vs. NINE WEST HOLDINGS, INC., a Delaware Corporation; MACY'S INC., a Delaware Corporation; and DOES 1-10, inclusive, Defendants.) CASE NO. 2:17-cv-04923-DMG-KS) DECLARATION OF CINDY CHAN) IN RESPONSE TO OSC RE) DISMISSAL (DOCKET NO. 18)) Honorable Dolly M. Gee)

Honorable Dolly M. Gee

DECLARATION OF CINDY CHAN

I, CINDY CHAN, declare as follows:

1. I am an attorney at Blakely Law Group, counsel for Plaintiff Chrome Hearts LLC in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness could competently testify thereto.

2. I have been in settlement discussions with Diana Torres, Esq., counsel for Defendant Nine West Holdings, Inc. who currently has until August 30, 2017 to file an Answer or responsive pleading to the Complaint pursuant to the parties' stipulation (Docket No. 15). Said settlement discussions anticipate resolution of the entire matter, including Chrome Hearts's claims against Macy's.

3. While Ms. Torres has advised that Kirkland & Ellis has not yet been retained by Macy's for representation in this matter, she requested the same extension for Macy's, to which I agreed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of August 2017 in Manhattan Beach, California.

/s/ Cindy Chan
Cindy Chan